

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021- -C

IN RE:)	
Petition of MCImetro Access Transmission)	
Services Corp. d/b/a Verizon Access Transmission)	
Services for Review of SomosGov Inc.'s Denial of)	PETITION
Application for Numbering Resources)	
_____)	

MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services (Verizon Access), pursuant to S.C. Code Ann. §58-9-30 (2015), and in accordance with S.C. Code Ann. Regs. 103-825 (2012), hereby submits its Petition requesting that the Commission review the denial of Verizon Access' application by SomosGov, Inc. (Somos) for one contiguous Thousand Block of telephone numbers (Thousand Block) in the Columbia, South Carolina rate center, overturn that decision, and order that a Thousand Block be assigned to Verizon Access. In support of its Petition, Verizon Access would respectfully show, and request relief from the Commission, as follows:

1. Verizon Access is a competitive local exchange carrier that provides local exchange service and exchange access service in South Carolina pursuant to a certificate issued by this Commission.

2. Verizon Access' customers include large businesses and government agencies that use direct inward dialing (DID) arrangements to obtain telephone service for their employees at one or more locations.

3. The customer requesting numbering resources is Verizon, which is enlarging its technology footprint by expanding its current facilities, necessitating additional lines to support its staffing and communications needs. The customer selected Verizon Access as its service provider and requested 400 contiguous DID telephone numbers in the 803 NPA in the Columbia, South Carolina rate center. The customer states that it needs contiguous telephone numbers to facilitate its desired dial plan and the assignment of new DIDs. A copy of the customer's letter explaining the circumstances is attached as Exhibit 1.

4. Because Verizon Access does not have 400 consecutive DID numbers in its inventory, it applied on June 30, 2021 to the Pooling Administrator, Somos, for a Thousand Block in the Columbia, South Carolina rate center. Verizon Access' application is attached as Exhibit 2.

5. Somos denied Verizon Access' request the same day it was submitted because Verizon Access did not meet one of the FCC criteria that Somos applies -- months-to-exhaust. The projected months-to-exhaust was calculated at 41.665, higher than the 6-month criterion Somos applies. Somos' denial is attached as Exhibit 3.

6. The FCC has delegated authority to the Commission to address Somos' denial of a request for numbering resources, stating that "[w]e agree . . . that a safety valve mechanism should be established, and we delegate authority to state commissions to hear claims that a safety valve should be applied when the . . . Pooling Administrator denies a specific request for numbering resources."¹ Moreover, the FCC has determined that "a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request." Specifically, states "may grant requests for customers

¹ *Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, 17 FCC Rcd 146 ¶ 61(2001).

seeking contiguous blocks of numbers.”² Based on this authority, the Commission has overturned denials of numbering requests.³

7. Verizon Access’ request for a Thousand Block to meet its customer’s request for 400 contiguous numbers fits squarely within the framework established by the FCC for “safety valve” requests that the Commission is authorized to grant. Verizon Access respectfully requests that the Commission direct Somos to assign a Thousand Block for the Columbia, South Carolina rate center so that it can satisfy its customer’s request.

WHEREFORE, having fully set forth its Petition, Verizon Access respectfully requests that the Commission (1) review Somos’ decision to deny Verizon Access’ request for additional numbering resources, (2) overturn that decision, (3) direct Somos to assign Verizon Access a Thousand Block in the Columbia, South Carolina rate center, and (4) grant Verizon Access such other and further relief as may be just and proper.

Respectfully Submitted,

s/ John M.S. Hoefer
 John M. S. Hoefer
WILLOUGHBY & HOEFER, P.A.
 Post Office Box 8416
 Columbia, South Carolina
 29202-8416
 803-252-3300

Attorneys for MCImetro Access
 Transmission Services Corp. d/b/a Verizon
 Access Transmission Services

Columbia, South Carolina
 This 7th day of July, 2021

² Id. ¶ 64.

³ See, e.g., *Petition of BellSouth Telecommunications, Inc. for Review of NXX Code Denial in Summerville Rate Center*, Order Reversing NANPA Decision, Docket No. 2002-185-C, Order No. 2002-415 (2002).



Stephen Reinhard
MTS IV Consultant Network Services

June 29th, 2021

Verizon Business

Dear Sirs:

Verizon located at 1118 Saint Andrews Road Columbia, South Carolina 29210 continues to expand its technology footprint and needs an additional 400 consecutive DID (Direct Inward Dialing) numbers to support staffing and communication needs.

We obtained a list of 15 non-consecutive number blocks totaling 400 DIDs from Verizon business, but this is not suitable for business operations, because we will need to enter approx. 50 entries into multiple phone systems in order to maintain our dial plan. With a consecutive block of numbers we only need to add 1 routing entry for the entire block. The consecutive block will also make the assigning of new DIDs easier. We were told the random/misc blocks of DIDs is all they have left.

In order to properly manage out telecom services and for customers to intuitively know our phone numbers we need a consecutive range of sequential numbers. We have been asked by Verizon Business to provide this reason for the new/consecutive DID number range.

The point of contact for this request is:
Stephen Reinhard
614-560-8423
stephen.reinhard@verizonwireless.com

Sincerely,

Stephen Reinhard
MTS IV Consultant Network Services

Stephen E Reinhard.



Tracking Number: **803-COLUMBIA-SC-1462794**Thousands-Block (NPA-NXX-X) Application - Part 1A
Revised: October 31, 2019**Individual Block
Request**Type of
Application: ☒ New ☐ Change ⁱ ☐ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **MCIMETRO ACCESS TRANSMISSION SERVICES LLC - SC**

Headquarters Address: **13865 Sunrise Valley Dr**

City: **Herndon** State: **VA** ZIP: **20171**

Contact Name: **ruben galvan**

Contact Address: **2637 Summit Ave**

City: **Plano** State: **TX** ZIP: **75074**

Phone: **469-497-4172** Fax: **214-237-1403**

E-mail: **ruben.galvan@verizon.com**

Pooling Administrator:ⁱⁱ

Contact Name: **Patricia Soderland**

Contact Address: **2411 Dulles Corner Park Suite 250**

City: **Herndon** State: **VA** ZIP: **20171**

Phone: **571-363-3828** Fax: **571-363-3838**

E-mail: **psoderland@nanpa.com**

1.2 General Information:

Check one : No LRN needed ____ LRN neededⁱⁱⁱ: ____NPA: **803** LATA: **434** OCN^{iv}: **8534** Parent Company's OCN **7229**Number of Thousands-Blocks Requested : **1**Switch Identification (Switching Entity/POI^v): **CLMASCLNX3X**

Rate Center^{vi}: COLUMBIA

1.3 Dates:

Date of Application^{vii}: 06/30/2021

Requested Effective Date^{viii}: 07/31/2021

Requested Expedited Treatment? (See Section 8.6) Yes X No

Expedited Explanation:

☒ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : CAP OR CLEC (LEC, IXC, CMRS, Other)
- b) Primary Type of Service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment preference (Optional) 803-949-4
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool)

1.5 Type of Request:

Initial block for rate center : Yes If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes, attach months to exhaust worksheet

☐ By selecting this checkbox, I acknowledge that I am willing to accept a block in **red** and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change (Mark all that apply)

- ☐ OCN: Intra-company^{ix} ☐ Switching Id ☐ Part 1B
- ☐ OCN: Inter-company^x ☐ Effective Date

Change block : Yes If Yes, list NPA-NXX-X

1.6 Block Return :

- a) Is this block Contaminated: Yes No
- b) If Yes how many TNs are NOT available for assignment :
- c) Have all new Intra SP ports been completed in the NPAC: Yes No

d) Has this block been protected from further assignment: Yes ____ No ____

Disconnect block : Yes ____ If Yes, list NPA-NXX-X ____

Remarks:

I hereby certify that the above information requesting a Thousands-Block (NPA-NXX-X) is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block and Central Office Code Administration Guidelines (TBCOCAG) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

ruben galvan

Senior National Code Administrator

06/30/2021

Signature of Block Applicant

Title

Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers (SP) supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator (PA) section also requires the SP to fill in the PA's name, address, phone, fax and e-mail.

Section 1.2 Service Providers (SP) who need a Thousands-Block (NPA-NXX-X) assignment or for a Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a Part 1 Central Office Code (NPA-NXX) Application needs to also be submitted to the Pooling Administrator (PA). The SP should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia Technologies, Inc. dba iconectiv (iconectiv®) LERG™ Routing Guide^{xi}. The Operating Company Number (OCN) assigned to the SP and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectiv Telecom Routing Administration (TRA). In addition, the number of Thousands-Blocks requested should be supplied. The Switch Identification (Switching Entity/POI). Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider (SP) completes the application should be entered in this section, as well as the Effective Date of the requested Thousands-Block.

Section 1.4 Service Providers (SP) should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS or VoIP. Also indicate the primary type of business in which the Numbering Resource is to be used. SPs may indicate their preference for a particular Thousands-Block, e.g., 321-9XXX, or indicate any Thousands-Blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers (SP) indicate the type of request. Initial requests are for first applications for Thousands-Blocks in a Rate Center, Growth applications are for additional Thousands-Blocks in a Rate Center in which the Applicant already has Numbering Resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers (SP) shall indicate the updated/current information in regards to contaminated Telephone Numbers (TN) on the Thousands-Block they are

returning to the Industry Inventory Pool. Thousands-Blocks with over 10% contamination (101 TNs or more) shall not be returned to the Industry Inventory Pool except when a SP is exiting the market or is exchanging a Thousands-Block that was identified as being over 10% contaminated. If the Thousands-Block being returned is over 10% contaminated, the Pooling Administrator (PA) shall seek a new Thousands-Block Holder. If question c and/or d have a response of No, the request for return shall be denied.

The Thousands-Block applicant certifies veracity of this form by signing their name, and providing their title and date.

Footnotes:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator (PA) is available to assist in completing these forms.

ⁱⁱⁱA Part 1 Central Office (CO)Code (NPA-NXX) Application shall also need to be submitted to the Pooling Administrator (PA).

^{iv}Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to TRA (732-699-6700).

^vThis is an eleven-character descriptor of the Switching Entity/Point Of Interconnection (POI) provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM Code of the Switching Entity/POI.

^{vi}Rate Center name shall be a tariffed Rate Center.

^{vii}Acknowledgment and indication of disposition of this application shall be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii}Please ensure that the Central Office (CO) Code (NPA-NXX) of the LRN to be associated with this Thousands-Block(s) is/will be active in the PSTN prior to the effective date of the Thousands-Block(s).

^{ix}Select if you are the current Thousands-Block Holder.

^xSelect if you are not the current Thousands-Block Holder.

^{xi}iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCITM, CLLITM, LERGTM Routing Guide and TPMTM Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

Thousands-Block Months to Exhaust Certification Worksheet - TN Level¹ - Appendix 2

Revised: October 31, 2019

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 803-COLUMBIA-SC-1462794Date: Wednesday, June 30, 2021 OCN: 8534 Company Name: MCIMETRO ACCESS TRANSMISSION SERVICES LLC - SCRate Center: COLUMBIAList all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: 803-234-2, 803-234-3, 803-234-4, 803-234-5, 803-234-6, 803-234-7, 803-234-8, 803-299-0, 803-299-1, 803-299-2, 803-299-3, 803-299-4, 803-299-5, 803-299-6, 803-299-7, 803-299-8, 803-299-9, 803-451-3, 803-477-3, 803-576-4, 803-740-1, 803-740-2, 803-740-3, 803-740-4, 803-740-5, 803-740-6, 803-740-7, 803-873-9, 803-881-7,Name of Block Applicant: ruben galvanSignature: ruben galvanTitle: Senior National Code Administrator
214-237-1403Phone: 469-497-4172-

Fax:

E-Mail: ruben.galvan@verizon.comA. Available Numbers³: 2861B. Assigned Numbers: 26139C. Total Numbering Resources⁴: 29000D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation⁵: 0List
Excluded
Code(s) or
Block(s):

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
1	2	3	4	5	6	7	8	9	10	11	12	

E. Growth History -	<u>14</u>	<u>4</u>	<u>-111</u>	<u>12</u>	<u>0</u>	<u>2</u>
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Exhibit 2
Months to Exhaust Calc

Previous 6
months⁶

F. Forecast -
Next 12
months⁷

400 0 0 0 5 7 7 7 7 7 7 7

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)⁸: 68.667

H. Months
to Exhaust⁹
=

Numbers Available for Assignment to
Customers (A)

Average Monthly Forecast (G)

Block Requested
1

Available Numbers
2861

Months To Exhaust
41.665

I.

Utilization¹⁰
=

Assigned Numbers (B)

X 100 =

90.134

Total Numbering Resources (C)-Excluded
Numbers (D)

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Pooling Administrator (PA) when requesting additional Numbering Resources in a rate center. For auditing purposes, the applicant shall retain a copy of this document.

²List all Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-X). This information is available from the Total Numbering Resources in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

³The total quantity of numbers available for assignment from the Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁴The total quantity of Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-Blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated

number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁵Quantity of numbers activated in the past 90 days indicates newly acquired Thousands-Blocks (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

⁶Net change in Telephone Numbers (TN) no longer available for assignment in each previous month, starting with the most distant month as Month 1, and Month 6 as the current month.

⁷Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

⁸This field is automatically calculated and populated on this form in PAS.

⁹This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

¹⁰This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired Numbering Resources may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii)).

Pooling Administrator's Response/Confirmation - Part 3A
Revised: October 31, 2019

Tracking Number : 803-COLUMBIA-SC-1462794

Date of Application: 06/30/2021 Effective Date: _____
 Date of Receipt: 06/30/2021 Date of Response: 06/30/2021

Service Provider Name: MCIMETRO ACCESS TRANSMISSION SERVICES LLC - SC
 (LERGTM Routing Guide¹) OCN: 8534
 Parent Company OCN: 7229

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Patricia Soderland Phone: 571-363-3828
 Signature of Pooling Administrator
Patricia Soderland Fax: 571-363-3838
 Name (print)
 Email: psoderland@nanpa.com

 NPA-NXX or
 NPA-NXX-X : Block Assigned: _____
 Block Reserved : _____
 Block Reservation
 Expiration Date : _____
 Block/Code
 Modified : _____
 Block/Code
 Disconnected : _____

Block Contaminated (Yes or
 No): _____

If yes, enter the number of
 TNs contaminated (1-1000): _____

Switch Identification
 (Switching/POI)²: _____

CLMASCLNX3X

Rate Center: _____

COLUMBIA

X Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3A denial. If you are in

disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for the appeals process.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

¹ iconectiv®, Telcordia®, and Common Language® are registered trademarks and CLCI™, CLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.